

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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JUE ZHANG,

Plaintiff,

v.

SHRAGA N. GOLDBERG, M.D.,

Defendants.

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C.A. NO. 04-12735PBS

**FURTHER MOTION OF THE DEFENDANT, SHRAGA N. GOLDBERG, M.D.,  
TO EXTEND THE DISCOVERY DEADLINE 60 DAYS  
*ASSENTED-TO BY THE PLAINTIFF***

The Defendant, Shraga N. Goldberg (“Dr. Goldberg”), respectfully requests that this Court extend the deadline in which discovery in the referenced matter is to be completed 60 days from March 30, 2006 until **May 30, 2006**, and extend the other deadlines pursuant to the graph below, to which the plaintiff assents. In support thereof, the defendant states the following:

1. This is the first request for a short discovery extension.
2. The extension is necessary to conduct the deposition of Dr. Goldberg as defense counsel is on trial and/or out-of-state through March 2006 and is unable to represent him at his deposition until after the expiration of the deadline.
3. The parties have agreed to the following revised schedule:

<i><b>Current Deadline</b></i>	<i><b>Revised Deadline</b></i>
3/30/06 - Discovery Completed	5/30/06
4/30/06- Plaintiff's Expert Disclosure	6/30/06
5/30/06- Defendant's Expert Disclosure	7/30/06
8/30/06- Expert Depositions	Same
9/19/06- Pre-Trial	Same
9/25/06- TRIAL (1/2 DAY sessions in front of Magistrate Judge Collings)	Same. If available to Court and counsel. The defendant believes this is to be discussed at Status Conference.

4. The **plaintiff's counsel has assented** to this motion.

Wherefore, the parties request that the discovery deadline be extended 60 days and other related deadlines be extended as listed above.

The Defendant,  
SHRAGA N. GOLDBERG, M.D.,  
By his attorney,

The Plaintiff,  
JUE ZHANG,  
By her Attorneys,

/s/ Jennifer Boyd Herlihy  
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